

The Atlantic Foundation

March 14, 2025

VIA ECF & EMAIL

The Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007
OetkenNYSDChambers@nysd.uscourts.gov

Re: Request for Extension of Time –Transcript Redactions
Thompson v. City of New York, et al., No. 22-cv-1458 (JPO)(KHP)

Dear Judge Oetken:

I write on behalf of Plaintiff Kwaine Thompson, as his former *pro bono* counsel,¹ in the above-referenced matter regarding the Court's order of March 12, 2025, directing counsel to file complete versions of certain transcripts by today, March 14 (ECF No. 193). With this letter, I respectfully request an extension until Tuesday, March 18, 2025, for additional time to propose redactions and, if necessary, prepare an application for leave to file materials with redactions and/or under seal.

Based on a preliminary review of the transcripts, there are certain portions that discuss or reveal sensitive/private information as defined by the ECF Privacy Policy and consistent with Your Honor's Individual Rules of Practice, for example. To name a few things, there are mentions of Mr. Thompson's medical information and criminal history, as well as sensitive discussions of his alleged abuse and experiences on Rikers Island. Apart from that, the sensitive information implicates the parties' confidentiality stipulation, which requires the parties to meet and confer about proposed redactions and filing under seal prior to seeking court approval.

¹ I no longer represent Mr. Thompson consistent with Local Civil Rule 1.4(c). By filing this letter, I am primarily attempting to ensure compliance with the Court's March 12 order. For background, I entered a limited appearance in this matter (ECF No. 105) to assist Mr. Thompson with drafting opposition papers for Defendants' summary judgment motion. Subsequently, once briefing on the motion was complete, I filed a Notice of Completion of Limited Appearance (ECF No. 185).

Re: Extension of time


March 14, 2025

Page 2 of 2

Accordingly, I respectfully request an extension of time until Tuesday, March 18, 2025, to complete a review of the transcripts, meet and confer with defense counsel to ascertain whether Defendants would like to propose any additional redactions, and finalize any proposed redactions.

Thank you very much for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Sami Elamad', with a stylized, cursive script.

Sami Elamad

Enclosures (by email only)

50-H Transcript

Hearing Transcript

cc: Kwaine Thompson (by U.S. mail w/ enclosures)
Gregory Accarino (by ECF and email w/ enclosures)